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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

)	
In re:)	Chapter 11
)	
PURDUE PHARMA, INC., et al.,¹)	Case No. 19-23649(RDD)
)	
Debtors.)	(Jointly Administered)
)	

**THE STATE OF ALABAMA’S JOINDER TO
THE STATE OF FLORIDA’S OBJECTION TO MOTION
OF DEBTORS PURSUANT TO 11 U.S.C. § 105(A) AND 363(B) FOR ENTRY
OF AN ORDER AUTHORIZING AND APPROVING SETTLEMENT TERM SHEET**

The State of Alabama, by its counsel, Wilk Auslander LLP, a creditor and party-in-interest in this action, joins *The State of Florida’s Objection to Motion of Debtors Pursuant to 11 U.S.C. § 105(a) and 363(b) for Entry of an Order Authorizing and Approving Settlement Term Sheet* [ECF No. 4413] (the “Florida Objection”)² filed on March 4, 2022, and states as follows:

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Florida Objection.

JOINDER AND STATEMENT

1. The State of Alabama joins in the Florida Objection to the *Motion of Debtors Pursuant to 11 U.S.C. § 105(a) and 363(b) for Entry of an Order Authorizing and Approving Settlement Term Sheet* [ECF No. 4410] (the “Motion”), by which the Debtors seek approval of a settlement term sheet among the Debtors, the Sackler Mediation Parties, and eight States and the District of Columbia (the “Nine”).

2. Alabama supports the settlement insofar as it seeks to provide States with additional value to dedicate to desperately needed opioid abatement efforts. However, any aspect of the settlement that provides disproportionately favorable treatment to the Nine (the “Side Deal”), or solely to New Hampshire (a Side Deal to the Side Deal), over other States not party to the settlement, violates the Bankruptcy Code for the reasons set forth in the Florida Objection.

3. In addition, the “Term Sheet” raises more questions than it answers. The reversal by the District Court means that there is no confirmed Plan currently in effect. Therefore, will Debtors amend the current Plan to reflect these new, material agreements or cut billion-dollar side deals with a minority of the States, on a week’s notice, through approval of a “Term Sheet”?

4. Finally, the Office of the United States Trustee is neither one of the Nine nor a party that has settled the appeal with the Debtors. Absent an agreement with the U.S. Trustee, and finality related to the appeal, it is not clear why the Court should grant the extraordinary relief sought in the Motion.

WHEREFORE, the State of Alabama respectfully requests that the Court deny the Motion insofar as it seeks to provide the eight States and the District of Columbia with disproportionately favorable distributions in contravention of the allocation previously established in these cases and the Bankruptcy Code.

Dated: March 8, 2022

Respectfully submitted,

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